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Attorneys for Plaintiff
MAUDELL MITCHELL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Maudelle Mitchell,

Plaintiff,

v.

McCormick & Schmick's Seafood
Restaurants, Inc., Landry's Inc., and DOES 1-
25,

Defendants.

Case No.: C 14-04974 RS

**STIPULATION AND ~~[PROPOSED]~~ ORDER
CONTINUING DEADLINE FOR
COMPLETION OF MEDIATION**

Complaint filed: August 29, 2014
Trial Date: January 19, 2016

1 Plaintiff MAUDELLE MITCHELL ("Plaintiff") and Defendants McCORMICK &
2 SCHMICK RESTAURANT CORP., McCORMICK & SCHMICK'S SEAFOOD,
3 RESTAURANTS, INC., and LANDRY'S, INC. ("Defendants"), by and through their
4 respective undersigned attorneys, hereby stipulate and agree to continue the deadlines for
5 the parties to complete mediation in this matter.

6
7 WHEREAS, on November 10, 2014, Defendant removed this matter to this
8 Court from the Alameda Superior Court based on Diversity Jurisdiction;

9
10 WHEREAS, on February 19, 2015, the parties attended an Initial Case
11 Management Conference;

12
13 WHEREAS, on February 19, 2015, the Court issued a Case Management
14 Order setting the last day for the parties to hold mediation of this matter on June 19, 2015;

15
16 WHEREAS, on March 16, 2015, the Court filed a Notice of Appointment of
17 Mediator of JoAnne Dellaverson;

18
19 WHEREAS, Ms. Dellaverson is on vacation and unavailable for most of the
20 month of June;

21
22 WHEREAS counsel for the parties have conferred and all parties have agreed
23 to have the mediation on July 23, 2015;

24
25 WHEREAS, trial of this matter is not scheduled until January 19, 2016, and the
26 July 20 mediation date will have no impact on the trial date or any other pre-trial dates;

1 NOW, THEREFORE,

2
3 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs and
4 Defendant, by and through their respective undersigned attorneys of record, to continue the
5 last date to complete mediation from June 19, 2015 to July 31, 2015.

6
7 Good cause exists for this continuance of the existing date of the Court's
8 Order for the reasons set forth above.

9
10 **IT IS SO STIPULATED.**

11
12 Dated: March 31, 2015

LIBERATION LAW GROUP

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15 By: /s/ Arlo Garcia Uriarte

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17 Arlo Garcia Uriarte
18 Un Kei Wu
19 Ernesto Sanchez
20 Brent A. Robinson
Attorneys for Plaintiffs
MAUDELL MITCHELL

21 Dated: March 31, 2015

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24 By: /s/ Janine S. Simerly

25 Janine S. Simerly
26 Attorneys for Defendants
27 McCORMICK & SCHMICK RESTAURANT
CORP.; McCORMICK & SCHMICK'S
28 SEAFOOD RESTAURANTS, INC.; and
LANDRY'S, INC.

[PROPOSED] ORDER

Having reviewed the Stipulation executed by Plaintiff MAUELLE MITCHELL and Defendants McCORMICK & SCHMICK RESTAURANT CORP., McCORMICK & SCHMICK'S SEAFOOD, RESTAURANTS, INC., and LANDRY'S, INC., and good cause appearing, the Court hereby orders that:

- The deadline for the parties to complete the mediation of this matter through the Northern District ADR program is hereby continued from June 19, 2015 to July 31, 2015.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 4/1/15



Hon. Richard Seeborg
District Judge

4849-6390-0706, v. 1